

New Beginnings Movement Inc
900 W Powers St
Muncie, IN 47305

August 8, 2022

FCC File Number: 0000167179

Facility ID: 768120

WORLD FEDERATION OF PASTORS AND MINISTERS OF THE FULL GOSPEL, INC

Petition To Deny

Petitioner submits this Petition to Deny as the applicant has not specified an "actual" community of License for allotment purposes. The application is a scam or attempt to subvert Commission Policies on Community Of License Requirements, The applicant has frivolously and with forethought and malice specified Country Squire Lakes Trailer Court as its non existent "Community Of License." Country Squire Lakes Indiana as a City does not exist. For the reasons noted below the Application should be dismissed "ab initio" and allow the process with the remaining applicants in the MXed group to start over, possibly allowing engineering changes to allow singleton Permits.

Discussion

The Applicant specified Country Squire Lakes Indiana as a "Community" Country Squire Lakes Trailer Court is located at an address of North Vernon Indiana : 3470 N Atkinson Circle, North Vernon, IN 47265. The Licensee and it's attorney have misled Staff in filing a fictitious application, and have abused process.

Applicants False Application

The applicant lied on the application when selecting a Community Of License. Country Squire Lakes Indiana is not a City of local subset of any Postal or Governmental structure.

By selecting "Country Squire Lakes Trailer Park" in The actual

City of North Vernon, IN as a fictitious "Community of License" the applicant has misled the Commission and lied on the application.

Country Squire Lakes Trailer Park has no Post Office. Country Squire Lakes Trailer Park has no school of any kind: Elementary, Jr High, or High School. Country Squire Lakes Trailer Park has no Government of ANY kind whatsoever: No Mayor, City Council, Township Trustee, or Dog Catcher. There is no store or ANY business that claims Country Squire Lakes Trailer Park as it's home. Any nearby business have a North Vernon Indiana address.

The resident of the trailer park all claim a North Vernon Indiana address.

The Country Squire Lakes Trailer Park is not in the US Census however it's community North Vernon Indiana is.

Community coverage requirements:

Staff requires community of license must be specified. This community must be recognized or could be recognized as a community for "allotment" purposes." This means that the community should have some kind of identity to it (people identify themselves as being from that community) and at the minimum, the community be listed in the US Census Bureau's Gazetteer as at least a "census designated place". The people in the Country Squire Lakes Trailer Park identify as being from North Vernon, Indiana and receive mail at a North Vernon, Indiana address.

Commission Decision Resulting Action

If Staff accepts this Act by the proposed Licensee it sets a precedent and changes all allotment procedures. We may soon have a Community Of License such as McDonalds, Burger King, Motel 6, Trailer Park, or similar nonsensical non existent Community Of License Cities which do not exist, are not in the US Census, or are wholly within the boundaries of an actual community that exists as in this instant application.

Etc

Applicant attempted to settle during the settlement period for the MXed group and after the period had ended. As the application

intentionally overlapped other applicants with actual Communities of License it has misused and abused process by it's filing.

A local worker for the applicant is an employee of a nearby For Profit Radio Station who also operates non profit stations. The connection implies a "front" application as has taken place in Commission history.

The associated Florida Secretary of State records leave some question as to whom the principals actually are. Supplied as pdf exhibits. The whole application is a scam.

Curative Action

Staff should dismiss the application and start over with the remaining applicants. Staff should then allow those applicants to start over as if the faulty and fictitious application never existed, "ab initio".

This best course of action would allow the applicants who have a "real" and "acceptable Community of License to attempt antenna changes, location changes, and allow resolution of the "real" applicants in the MXed group.

Conclusion

This application is a purposeful scam that violates Commission Policy related to an acceptable Community Of License based on Commission Rules and Policy as it relates to allotments and was unacceptable for filing at the time of filing. The Applicant committed "Abuse Of Process". The Application should be dismissed "ab initio" and the MXed group reset to allow settlement and possible singleton applications from the Licensees and Applicants in the MXed Group.

Sincerely

Martin L. Hensley (Electronic Signature)
August 8 2022

Affidavit of Martin Hensley

I reviewed the application submitted by WORLD FEDERATION OF PASTORS AND MINISTERS OF THE FULL GOSPEL, INC and have found the

entire application to be a scam to subvert Commission Process. The action affects negatively all the other applicants within the Mxed Group and Relief is desired that would reset the Mxed group without the applicant claiming the non existent community of Country Squire Lakes, Indiana.

The application would not be accepted as an allotment under Current Rules and is at best abuse of process. The applicant lied on the application when selecting a Community Of License.

I submit that these facts are true under penalty of perjury and requests Staff provide the appropriate relief as requested.

Martin Hensley (Electronic Signature)
August 8 2022

Certificate Of Service

This filing has been served on all applicants in the Mxed Group via the Commission Filing System, via email, and via US Mail.

Martin Hensley (Electronic Signature)
August 8 2022